

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

UNITED STATES OF AMERICA

v.

Case number: 2:21-cr-00127

RAYMOND DUGAN

**DEFENDANT'S MOTION TO CONTINUE TRIAL
AND ASSOCIATED PRETRIAL DATES
AND TO RESERVE THE RIGHT TO FILE PRETRIAL MOTIONS**

Now comes the defendant, Raymond Dugan, by counsel, David Schles, and moves this Court to continue the trial and all associated events in this matter, including the date for filing of additional pre-trial motions. In support of this motion the defendant avers:

1. Mr. Dugan was arraigned on August 17, 2021. The trial is currently scheduled for October 13, 2021; pretrial motions are due September 9, 2021; and the pretrial motions hearing is scheduled for September 22, 2021.
2. The initial discovery disclosure from the government and a first supplemental disclosure were both received by counsel on September 2, 2021. As would be expected in a matter such as this, discovery is voluminous and complex. Counsel has begun reviewing the discovery but substantially more time will be required for the defense to prepare both for pretrial proceedings and for the trial.
3. Counsel for the defendant has conferred with counsel for the government, Assistant United States Attorney Julie White, and is authorized to inform the Court that the government

does not object to the requested continuance.

Wherefore, in light of the foregoing, the defendant respectfully requests that this Court continue the trial and associated pretrial dates. Defendant respectfully requests that the trial, pretrial hearing, deadline for filing motions and all other associated dates be continued for approximately sixty (60) days.

Respectfully Submitted,
Raymond Dugan
By counsel,

s/ David Schles
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CERTIFICATE OF SERVICE

I, David Schles, counsel for defendant, Raymond Dugan do hereby certify that on this 7th day of September 2021, the foregoing **DEFENDANT'S MOTION TO CONTINUE TRIAL AND ASSOCIATED PRETRIAL DATES AND TO RESERVE THE RIGHT TO FILE PRETRIAL MOTIONS** was served upon the following by CM/EMF electronic filing:

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